

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JACQUELYN M. HOSTLER	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JACQUELYN M. HOSTLER	:	
Respondent	:	CASE NO. 1-23-bk-01687

TRUSTEE’S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 19<sup>th</sup> day of March , 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J – to make tiered payments starting in November of 2024.
2. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:
  - a. The Plan contains inappropriate nonstandard provisions(s), contrary to § 1322(b)(11). See *In re Parkman*, 589 B.R. 567, 574 (Bankr. S.D. Miss. 2018); *In re Mank*, No. 19-04199, 2020 WL 1228671 at \*2 (Bankr. E.D.N.C. Mar. 3, 2020).

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 19th day of March, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

James Jones, Esquire  
2320 N. Second Street  
Harrisburg, PA 17110

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee